

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

January 9, 2004

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T.R.A. DOCKET ROOM

IN RE:

IMPLEMENTATION OF THE FEDERAL)	
COMMUNICATIONS COMMISSION'S)	DOCKET NO.
TRIENNIAL REVIEW ORDER - 9 MONTH)	03-00527
PROCEEDING - LOOP AND TRANSPORT)	

**COMPSOUTH'S INTERROGATORIES
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

Pursuant to the Hearing Officer's procedural schedule dated, December 22, 2003, the Competitive Carriers of the South, Inc.,¹ hereby serves the following interrogatories on BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

¹ The members of CompSouth include: Access Integrated Networks, Inc. MCI, Birch Telecom, Business Telecom, Inc., Covad Communications Company, AT&T, NewSouth Communications Corp., Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Business Solutions, Cinergy Communications Company, Network Telephone corp., KMC Telecom, Z-Tel Communications, Inc., and IDS Telcom LLC.

3. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

9. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

10. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

12. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

13. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the

circumstances surrounding the authorization for each such disposition and the date of such disposition.

14. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

15. "Access Line" refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems ("DLC") that is used for serving residential and small business customers. "Access Line" does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

16. Digital Loop Carrier ("DLC") includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

17. "ILEC" refers to Incumbent Local Exchange Carrier.

18. "CLLI code" refers to Common Language Location Identifier.

19. "CO" refers to Central Office.

20. "Coordinated cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch.

21. "Coordinated time-specific cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.

22. "CWINS" refers to Customer Wholesale Interconnection Services.

23. "DSO" refers to Digital Signal, level zero.
24. "FCC" refers to the Federal Communications Commission.
25. "LCSC" refers to Local Carrier Service Center.
26. "LSR" refers to Local Service Request.
27. "MDF" refers to Main Distribution Frame.
28. "OSS" refers to Operational Support Systems.
29. "PIC" refers to Primary Interexchange Carrier.
30. "SEEM" refers to Self Effectuating Enforcement Mechanism.
31. "UNE" refers to Unbundled Network Element.
32. "UNE-L" refers to Unbundled Network Element-Loop.
33. "UNE-P" refers to Unbundled Network Element –Platform.
34. "LIDB" refers to Line Information Database.
35. "MSA" refers to Metropolitan Statistical Area.
36. "LATA" refers to Local Access and Transport Area.
37. Unless otherwise stated, information requests refer to BellSouth's nine-state region.

GENERAL INSTRUCTIONS

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;

- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent BellSouth has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in BellSouth's nine-state region or any other state in proceedings in which BellSouth and COMPSOUTH are parties, BellSouth need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of

such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

INTERROGATORIES

A. Loops

1. For each customer location in BellSouth territory identified in your submission in this docket on January 2, 2004 for which CLECs are not impaired without access to BellSouth's Unbundled High Capacity Loops, state and identify:
 - a.
 - (1) whether the self-provisioning trigger has been met,
 - (2) each capacity level (i.e., DS 3, dark fiber) at which such trigger has been met,
 - (3) the carriers currently deploying loops at such capacity level and, with regard to DS 3 loops, are currently serving customers via those facilities,
 - (4) whether BellSouth has identified the existence of fiber optic facilities and electronics but has not determined the relevant service or capacity provided over those facilities, and
 - (5) all documents, studies, or records showing that the self-provisioning trigger has been met.

ANSWER:

- b.
 - (1) whether the wholesale provisioning trigger has been met,
 - (2) each capacity level (i.e., DS 1, DS 3) at which such trigger has been met,
 - (3) the carriers currently deploying loops at such capacity level, and which are offering such facility on a widely

available wholesale basis, and which have access to the entire customer location,

- (4) whether BellSouth has identified the existence of fiber optic facilities and electronics but has not determined the relevant service or capacity provided over those facilities, and
- (5) all documents, studies, or records showing that the wholesale trigger has been met.

ANSWER:

B. Dedicated Interoffice Transport

- 2. For each specific route identified in your submission in this docket on January 2, 2004 for which CLECs are not impaired without access to BellSouth's unbundled transport, state and identify:

- a.
 - (1) whether the self-provisioning trigger has been met,
 - (2) each capacity level (i.e., DS 3, dark fiber) at which such trigger has been met,
 - (3) the carriers currently providing each such capacity level,
 - (4) the carriers deploying transport at each such capacity level and, in the case of DS 3 transport, which are operationally ready to use such transport,
 - (5) the "A" and "Z" locations on the route,
 - (6) whether BellSouth has identified the existence of fiber optic facilities and electronics at each endpoint but not determined the relevant service or capacity provided over those facilities,
 - (7) whether BellSouth has not determined whether actual circuits or paths at the relevant capacity are in existence between the two routes, and
 - (8) all documents, studies, or records showing that the self-provisioning trigger has been met.

ANSWER:

- b. (1) whether the wholesale provisioning trigger has been met,
- (2) each capacity level (i.e., DS 1, DS 3, dark fiber) at which such trigger has been met,
- (3) the carriers currently providing each such capacity level,
- (4) the carriers deploying transport at each such capacity level, and which are operationally ready to use such transport, and which are willing immediately to provide such transport, on a widely available basis,
- (5) the “A” and “Z” locations on the route,
- (6) whether BellSouth has identified the existence of fiber optic facilities and electronics at each endpoint but not determined the relevant service or capacity provided over those facilities,
- (7) whether BellSouth has not determined whether actual circuits or paths at the relevant capacity are in existence between the two routes, and
- (8) all documents, studies, or records showing that the wholesale trigger has been met.

ANSWER:

- 3. For each transport route identified in your response to 2(a) as satisfying the self-provisioning trigger, identify each instance in which BellSouth has provisioned to any of the carriers identified as self-provisioning providers (i) UNE transport, (ii) UNE dark fiber or (iii) special access, between the “A” and “Z” locations on the route. Provide for each carrier, the number of circuits or elements for which BellSouth is currently billing the carrier, the type of service provided (i.e., UNE transport, UNE dark fiber, special access) and the capacity level of each circuit or element provisioned. Please provide any such list in an electronic format that may be manipulated (e.g., Word, Excel).

ANSWER:

4. For each transport route identified in your response to 2(b) as satisfying the wholesale provisioning trigger, identify each instance in which BellSouth has provisioned to any of the carriers identified as wholesale providers (i) UNE transport, (ii) UNE dark fiber or (iii) special access, between the “A” and “Z” locations on the route. Provide for each carrier, the number of circuits or elements for which BellSouth is currently billing the carrier, the type of service provided (i.e., UNE transport, UNE dark fiber, special access) and the capacity level of each circuit or element provisioned. Please provide any such list in an electronic format that may be manipulated (e.g., Word, Excel).

ANSWER:

5. State whether collocation space is exhausted in any of the “A” or “Z,” locations identified in any of your responses to data requests nos. 2, 3 and 4, and identify with specificity such locations.

ANSWER:

6. For the past year (or such other time frame dating to approximately January 1, 2003, as is readily available), state the following information separately for DSL, DS3 and dark fiber transport orders:
 - a. The number of LSRs requesting UNE transport between the “A” and “Z” end points of the routes identified in any of your responses to data requests nos. 2, 3 and 4;
 - b. The number of “no facilities” responses BellSouth has returned in response to these LSRs; and
 - c. The number of UNE transport or dark fiber circuits provisioned.

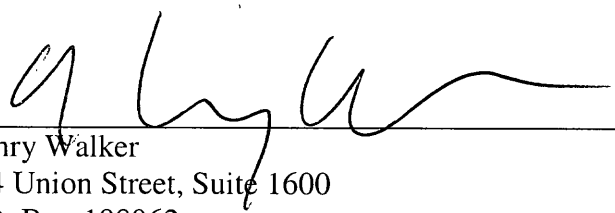
For each "no facilities" response identified, state the reason given for the "no facilities" response and the estimated time period in which the facility was anticipated to be available.

ANSWER:

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2004 a copy of the foregoing document was serviced on the parties of record, via US mail:

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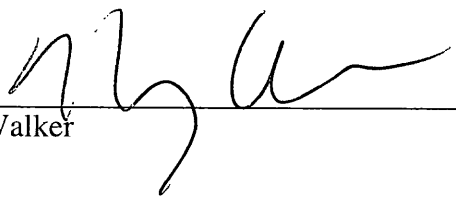
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